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Co-Lead Counsel for the Direct Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

IN RE: TFT-LCD (FLAT PANEL)
 ANTITRUST LITIGATION

No. 3:07-md-1827 SI
 MDL No. 1827

This Document Relates To:
 ALL DIRECT PURCHASER ACTIONS

**STIPULATION AND [PROPOSED]
 ORDER RE DIRECT PURCHASER CLASS
 PLAINTIFFS' OPPOSITION TO
 HITACHI'S MOTION TO CHANGE TIME
 TO FILE AN OBJECTION TO THE
 SPECIAL MASTER'S ORDER RE
 MOTION BY DIRECT PURCHASER
 CLASS PLAINTIFFS TO COMPEL
 HITACHI TO PRODUCE FOREIGN
 REGULATORY DOCUMENTS**

STIPULATION

WHEREAS Hitachi, Ltd., Hitachi Displays, Ltd. and Hitachi Electronic Devices (USA), Inc. (together, "Hitachi") currently must file any objection to the Special Master's December 22, 2010 Order re Motion by Direct Purchaser Class Plaintiffs to Compel Hitachi to Produce Foreign Regulatory Documents ("the Order", Docket #2244) by Wednesday, January 5, 2011;

WHEREAS the Special Master has notified Hitachi and plaintiffs that he is consulting with Judge Illston regarding Hitachi's application for a stay of the January 22, 2011 deadline imposed by the Order (*see* Dkt. No. 2258-5 (E-mail from Martin Quinn to Kent Roger dated December 29, 2010));

WHEREAS on Thursday, December 30, 2010, Hitachi filed a motion to change the January 5, 2011 deadline (Docket #2257);

WHEREAS plaintiffs' response to that motion would by Local Rule be due Monday, January 3, 2011; and

WHEREAS undersigned plaintiffs' counsel has oral argument in the Central District of California on January 3, 2011;

IT IS HEREBY STIPULATED AND AGREED by and between plaintiffs and Hitachi, by and through their undersigned counsel, subject to the Court's approval, that plaintiffs' deadline to respond to Hitachi's motion shall be extended to January 5, 2011, and Hitachi's deadline to object to the Order shall be extended to January 7, 2011 or another date, if any, the Court sets as a result of its consultation with the Special Master and consideration of Hitachi's motion.

1 Dated: January 1, 2011

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

2 By: /s/ Brendan Glackin
Brendan Glackin

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11 *Co-Lead Counsel for the Direct Purchaser Class Plaintiffs*

12 MORGAN, LEWIS & BOCKIUS LLP

14 By: /s/ Kent M. Roger
Kent M. Roger

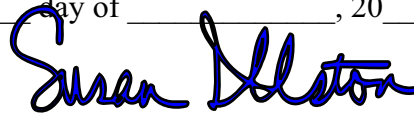
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19 *Attorneys for Defendants Hitachi Electronic Devices*
20 *(USA), Inc., Hitachi, Ltd., and Hitachi Displays, Ltd.*

22 **Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the**
23 **filing of this document has been obtained from Kent M. Roger.**

ORDER

SO ORDERED this _____ day of _____, 20__.

A handwritten signature in blue ink, reading "Susan Illston".

THE HONORABLE SUSAN ILLSTON
United States District Judge

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